



STATE OF TENNESSEE  
DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
CHATTANOOGA ENVIRONMENTAL FIELD OFFICE  
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CHATTANOOGA, TENNESSEE 37402  
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November 7, 2016

Certified Mail

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Mr. Thomas W. Solomon,  
City Manager  
City of Dayton  
e-copy: [daytonts@bellsouth.net](mailto:daytonts@bellsouth.net)  
PO Box 226  
Dayton, TN 37321

Re: Notice of Violation  
Dayton STP  
Compliance Sampling Inspection  
NPDES Permit Number TN0020478  
Rhea County

Dear Mr. Solomon:

On September 28, 2016 Ms. Angela Young of the Division of Water Resources, conducted a Compliance Sampling Inspection of the City of Dayton's wastewater treatment plant. Operator Mr. Jarade Sinclair, provided information during the inspection. The purpose of the inspection was to determine the City's compliance status with the terms and conditions of NPDES Permit Number TN0020478. The findings of the inspection are summarized below.

#### **Permit**

NPDES Permit Number TN0020478 became effective on July 1, 2014. The permit expires on December 31, 2016. The correct receiving waters (Tennessee River @ Mile 504) are listed. The type of wastewater and the treatment plant is correctly described. The effluent limitations and monitoring requirements are appropriate and protective of the classified uses of the Tennessee River. Your permit application has been received and is being processed.

#### **Records and Reports**

Discharge Monitoring Reports are submitted electronically via NetDMR. Monthly Operation Reports are reported to the field office as required.

#### **Facility Site Review**

All treatment units were in service during the inspection. Chlorine Contact chamber was experiencing structural problems when Ms. Young arrived. One of the baffle walls had collapsed. The area was secured to protect worker safety.

Samples were collected during the inspection for the flowing parameters: pH, D.O., Chlorine residual and E. coli. Samples were collected from the effluent sampling port. All results were below effluent limits set forth in your permit. Below are the sample results.

Temp c.	pH std. units	D. O. mg/l	Cl2 mg/l	E.coli mpn/100ml
25.86	7.43	4.36	1.6	435.2

~~revealed the following effluent violations of NPDES Permit Number TN0020478.~~

[illegible][illegible]

2016	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
BOD% Removal	X	X										
TSS % Removal	X											
BOD, 5-Day lb/day												
TSS lb/day												
Settleable Solids												
E. Coli												
Chlorine, TRC												

### Laboratory

40 CFR Part 136 approved methodology is used for all analyses. The laboratory equipment was in good condition and is serviced annually by Labtronix. The Method Update Rule is being implemented. Chlorine residual and E.coli are collected in a glass beaker that has been washed in the dishwasher. The dishwasher does have a sanitary mode for glassware. Other parameters are collected in a plastic bucket or composite sampler carboy.

### Operation and Maintenance

The wastewater plant operators hold the necessary Tennessee Wastewater Treatment Plant Operator Certifications. A schedule of routine preventive maintenance is in place and followed. Major maintenance is performed by additional City personnel or by contracted personnel.

### Sewer Overflows

A review of Discharge Monitoring Reports (DMR) from September 2014 through September 2016 revealed that the City of Dayton reported 14 overflows. Overflows are prohibited. **This is a violation of Part 2.1.15 of NPDES permit No. TN0020478.**

One dry weather overflow (9-7-16) resulted in a fish kill reported to this office. This overflow was not reported on the NetDMR for September 2016 according to EPA database. Please review NetDMR entries for September 2016 and verify that this overflow was reported correctly.

### Statement of Violations

- Sewer Overflows are prohibited. The City of Dayton has violated of Part 2.1.4 of NPDES permit No. TN0020478.

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- **Repeated violations of the effluent limitations contained in Part 1.1 of NPDES Permit NPDES permit No. TN0020478**

It is requested that a written response to this report be submitted by **December 7, 2016**. The response should detail what corrective actions have been implemented regarding the above noted violations.

The Division would like to thank City of Dayton wastewater staff for their time and cooperation during our inspection. If you have any questions concerning our inspection, please contact Ms. Young at 634-5708.

Sincerely,



Ms. Jennifer Innes  
Program Manager  
Division of Water Resources  
Chattanooga Field Office

cc: DWR-Enforcement and Compliance Unit (Electronic)